

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION**

AMERICAN CLOTHING EXPRESS, INC.,  
D/B/A ALLURE BRIDALS AND JUSTIN  
ALEXANDER, INC.,

Plaintiffs,

v.

CLOUDFLARE, INC. and DOES 1 - 200,  
inclusive,

Defendants.

Case No. 2:20-cv-02007-SHM-dkv

**MOTION FOR DEFAULT JUDGMENT AGAINST 94 WEBSITE DEFENDANTS**

Plaintiffs American Clothing Express, Inc., d/b/a Allure Bridals and Justin Alexander, Inc. (collectively, "Plaintiffs") respectfully move this Court, pursuant to Rule 55(b)(2) of the Federal Rules of Civil Procedure, against the 94 Website Defendants so defined in Exhibit 1 to the Declaration of Russell Bogart, Esq., and any such further relief as the Court deems just and proper. In further support thereof, Plaintiffs rely on the Memorandum of Law filed contemporaneously herewith, the Clerk's Entries of Default, the Declaration of Russell Bogart, Esq. and all accompanying exhibits, and all prior papers and proceedings herein.

DATED: December 6, 2021

Respectfully submitted,

s/ Nicole D. Berkowitz

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*Bridals and Justin Alexander, Inc.*

**CERTIFICATE OF CONSULTATION**

I hereby certify that on December 1, 2021, counsel for Plaintiffs conferred by email with counsel for Cloudflare, Inc. regarding the relief sought herein. On December 6, 2021, counsel for Cloudflare, Inc. indicated that Defendant Cloudflare, Inc. would like an opportunity to review the filing before providing its position. Counsel for Plaintiffs was unable to confer with the 94 Website Defendants who are in default.

s/ Nicole D. Berkowitz

Nicole D. Berkowitz

**CERTIFICATE OF SERVICE**

I hereby certify that on December 6, 2021, a true and correct copy of the foregoing was filed via the Court's CM/ECF system. Notice of this filing will be sent by operation of the Court's electronic filing system to all counsel of record.

s/ Nicole D. Berkowitz

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Nicole D. Berkowitz